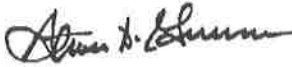


Exhibit “B”

Exhibit “B”

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CLERK OF THE COURT

1 **COMP**
2 **RICHARD HARRIS, ESQ.,**
3 Nevada Bar No: 505
4 **A. J. SHARP, ESQ.,**
5 Nevada Bar No. 11457
6 **RICHARD HARRIS LAW FIRM**
7 801 South Fourth St.
8 Las Vegas, NV 89101
9 Tel: 702-444-4444
Fax: 702-444-4455
Email: aj@richardharrislaw.com
Attorney for Plaintiff

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 **SANDRA FORREST,**

13 Plaintiff,

14 vs.

15 **COSTCO WHOLESALE**
16 **CORPORATION, a Foreign Corporation;**
17 **DOES 1-10 and ROE BUSINESS**
18 **ENTITIES 1-10, inclusive**

19 Defendants.

CASE NO: A-15-715264-C

DEPT. NO: XXVIII

20 **COMPLAINT**

21 COMES NOW, Plaintiff, SANDRA FORREST, by and through her attorney,
22 A. J. SHARP, ESQ., of RICHARD HARRIS LAW FIRM, and for her causes of action,
23 complains of Defendants, and each of them, as follows:
24

25 **GENERAL ALLEGATIONS**

- 26 1. That Plaintiff, SANDRA FORREST, (hereinafter "Plaintiff") is and at all
27 times mentioned herein, was a resident and citizen of the State of Nevada.
28 2. That Defendant, COSTCO WHOLESALE CORPORATION ("COSTCO") is,

RICHARD HARRIS
LAW FIRM



1 and at all times mentioned herein was, a foreign corporation formed under the
 2 laws of the State of Washington, duly authorized to do business, and doing
 3 business, in Clark County, Nevada.

4
 5
 6 3. That the true names or capacities, whether individual, corporate, associate or
 7 otherwise, of Defendants DOES 1-10 and ROE BUSINESS ENTITIES 1-10
 8 are unknown to Plaintiff, who therefore sues said Defendants by such
 9 fictitious names; Plaintiff is informed and believes and thereon alleges that
 10 each of the Defendants designated herein as DOE and ROE BUSINESS
 11 ENTITIES are responsible in some manner for the events and happenings
 12 referred to and caused damages proximately to Plaintiff as herein alleged, and
 13 that Plaintiff will ask leave of this Court to amend this complaint, to insert the
 14 true names and capacities of DOE 1-10 and ROE BUSINESS ENTITIES 1-
 15 10, when the same have been ascertained and to join such Defendants in this
 16 action.
 17

18
 19 4. That at all times pertinent, Defendants were agents, servants, employees or
 20 joint venturers of every other Defendant herein, and at all times mentioned
 21 herein were acting within the scope and course of said agency, employment,
 22 or joint venture, with knowledge and permission and consent of all other
 23 named Defendants.
 24

25 5. The true names and capacities whether individual, corporate, associate,
 26 partnership or otherwise of the Defendants herein designated as ROE
 27 ENTITIES 1-10, inclusive, are unknown to the Plaintiff who therefore sues
 28 said Defendants by such fictitious names. Plaintiff is informed and believes,



1 and thereupon alleges, that ROE ENTITIES 1-10 designed, manufactured,
 2 distributed, sold, installed, owned, operated, managed, controlled, maintained
 3 the floor at the day and time of the subject incident, and that each of the ROE
 5 Defendants are legally responsible for the damages suffered by Plaintiff as
 6 herein alleged due to their negligence. Plaintiff further alleges that ROE
 7 ENTITIES 1-10 were negligent in relation to the hiring, training, supervision,
 8 maintenance and retention of their employees, as well as the operation and
 9 management of those companies and/or persons working on the subject
 10 project at the date and time of the incident. Plaintiff further alleges that ROE
 11 ENTITIES 1-10 are each liable under an agency theory as the principal of the
 12 tortfeasor who was acting within the course, scope and authority of the agency
 13 relationship.
 14
 15

16
 17 **CAUSE OF ACTION – NEGLIGENCE**
 18 **(against all Defendants)**

- 19 6. Plaintiff repeats and realleges the allegations in Paragraphs 1-5 above as
 20 though fully set forth herein.
- 21 7. On or about June 28, 2014, Plaintiff SANDRA FORREST was walking at
 22 COSTCO's premises, located at 801 South Pavilion Center Drive, Las Vegas,
 23 Nevada, when she was caused to fall and suffer injuries due to Defendants'
 24 negligently maintained premises.
- 25 8. That at all times relevant, the Defendants, and each of them, were the
 26 independent contractors, joint ventures, partners, servants, officers, agents,
 27 and employees of COSTCO and/or all other Defendants, and were acting
 28 within the scope and performance of said relationship.



- 1 9. At all times mentioned, the DOE and ROE Defendants were the designers,
2 manufacturers, installers, and maintainers, owners, managers, inspectors,
3 supervisors and controllers of the premises and common areas at 801 South
4 Pavilion Center Drive, Las Vegas, Nevada.
5
- 6 10. That Defendants and each of them failed to exercise due care to protect
7 Plaintiff SANDRA FORREST from harm.
8
- 9 11. That as a proximate and actual result of Defendants' negligence, Plaintiff
10 sustained substantial bodily injuries and emotional distress. All of said
11 injuries have caused and will continue to cause Plaintiff great mental and
12 physical pain and suffering, all to her general damage in an amount in excess
13 of TEN THOUSAND (\$10,000.00) DOLLARS.
14
- 15 12. That as a proximate result of Defendants' negligence, Plaintiff has been
16 required to expend money and incur obligations, and will continue to do so for
17 services and items reasonably required in the treatment and relief of the
18 injuries herein alleged, all to her special damages in an amount according to
19 proof at trial.
20
- 21 13. That as a proximate result of Defendants' negligence, Plaintiff SANDRA
22 FORREST was prevented from attending to her usual occupation or limited,
23 and thereby has past and future loss of earnings and earning capacity all to her
24 special damage in an amount according to proof at trial.
25
- 26 14. That it has become necessary for Plaintiff to retain the services of an attorney
27 to prosecute this action and Plaintiff is entitled to an award of reasonable
28 attorney's fees.



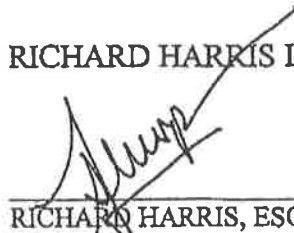
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and each of them, as follows:

1. For Plaintiff's general damages in an amount in excess of \$10,000.00;
2. For health care expense and other special damages in an amount according to proof at trial;
3. For Plaintiff's past and future lost wages and loss of earning capacity in an amount according to proof at trial;
4. For attorney's fees and costs of suit incurred herein; and
5. For such other and further relief this Court may deem just and proper.

DATED this 10th day of March 2015.

RICHARD HARRIS LAW FIRM



RICHARD HARRIS, ESQ.
Nevada Bar No. 505
A. J. SHARP, ESQ.
Nevada Bar No. 11457
RICHARD HARRIS LAW FIRM
801 South Fourth Street
Las Vegas, Nevada 89101
(702) 444-4444
Attorneys for Plaintiff



PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and each of them, as follows:

1. For Plaintiff's general damages in an amount in excess of \$10,000.00;
2. For health care expense and other special damages in an amount according to proof at trial;
3. For Plaintiff's past and future lost wages and loss of earning capacity in an amount according to proof at trial;
4. For attorney's fees and costs of suit incurred herein; and
5. For such other and further relief this Court may deem just and proper.

DATED this 10th day of March 2015.

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